

## **Exhibit 47**

# **SCHOOL DISTRICT/LOCAL GOVERNMENT ENTITY PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO EXCLUDE TESTIMONY OF SCHOOL DISTRICT EXPERTS**

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

**IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION,**

Case No. 4:22-MD-03047-YGR

**THIS DOCUMENT RELATES TO:**

MDL No. 3047

Irvington Public Schools v. Meta Platforms  
Inc., et al.

**AFFIDAVIT OF SANDRA LOPEZ**

Member Case No.: 4:23-cv-1467

My name is Sandra Lopez, and I make this declaration based on my personal knowledge.

1. I received a Bachelor of Arts degree in Psychology in 1984 from Seton Hall University, and a Master's degree in Social Work in 1989 from Rutgers University

2. I have 34 years of experience working in elementary and middle school education.

3. I have worked in the Irvington School District since 1991.

4. I am currently a Health and Social Services Coordinator ("HSSC") at University Middle School ("UMS") in Irvington. I have held that position since 2005. From 1991 to 2005, I was a Student Assistance Counselor ("SAC") at UMS.

5. In my positions, I have provided counseling services to scholars, including social and emotional learning, mental health support, and crisis intervention / behavioral threat assessments. My positions have included working with parents and families regarding these same issues. The

1 UMS guidance and HSSC teams also conduct monthly initiatives, such as classroom presentations  
2 relating to mental health, harassment, intimidation and bullying (“HIB”) issues, and cyberbullying.  
3 Other presentations have included social media safety.

4 6. Currently, addressing the effects of social media on scholars is one of the biggest challenge  
5 we face at UMS. A clear majority of the scholars who walk into our school are dealing with an  
6 issue related to social media.

7 7. In my experience, I have seen a growing problem of addictive, compulsive and problematic  
8 social media use among our scholars. We face a constant battle in dealing with issues that relate to  
9 social media use by our scholars.

10 8. I have also observed a rise in scholar anxiety and depression, which I believe is tied to social  
11 media. For example, teachers are unable to finish a class day without stopping their scholars’ use  
12 of a social media site, posting on said site, and intervening in disruptions that are caused by  
13 something shared on social media. This was not an issue of any kind at the beginning of my  
14 counseling career. Today, it has taken over the learning space and culture of UMS. There is not a  
15 day that goes by that the administration and guidance and HSSC teams do not have to intervene in  
16 a social media-related event.

17 9. Ultimately, there are numerous negative effects of social media on scholars at UMS. These  
18 effects include, but are not limited to, excessive use of social media which impacts scholar’s mental  
19 health, emotional well-being as described above, and performance in school, mental health  
20 deterioration caused by scholars’ use of social media, scholars’ use of fake social media accounts  
21 which expose children to dangerous situations on social media, bullying and harassment that occurs  
22 on social media platforms and spills over into the school environment, increased social  
23 comparisons, and fear of missing out, or “FOMO.”

24 10. Importantly, I have observed that the impacts of social media on scholars’ well-being are  
25 unique to social media use.  
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1 11. I have observed that when a scholar is tagged on Defendants' platforms in images that are  
2 not realistic or do not demonstrate a teenage girl's reality, but that nonetheless receive negative  
3 comments, many scholars' self-esteem is diminished because of those negative comments.

4 12. Further, we have observed verbal and physical altercations. Often, as a result of comments  
5 made on, for instance, Instagram and Snapchat group chats, scholars have engaged in those verbal  
6 and physical altercations. Investigations that result from these altercations take up a considerable  
7 amount of counseling / HSSC and administrative time attempting to resolve the issues created by  
8 these group chats.  
9

10 13. Similarly, bullying and harassment that occurs on social media platforms exacerbate the  
11 issues that UMS must address, as the bullying and harassment are disseminated further and for  
12 longer periods of time than they would be absent a social media platform, and social media  
13 emboldens scholars to engage in this type of behavior that does not occur when interacting in  
14 person.  
15

16 14. In a specific instance, a scholar was exposed to incredibly demeaning comments as a result  
17 of a sexually explicit photo that was alleged to be her. The fact that it was not was irrelevant as the  
18 students continued to harass her and unfriend her. This behavior, through the social media  
19 platforms, led the student to have suicidal thoughts and, thereafter, referred for a psychiatric  
20 evaluation.  
21

22 15. Moreover, UMS is aware of numerous social media accounts that impact its scholars, many  
23 of which are related to fighting among the students, including at least one account specific to UMS.  
24 While UMS is aware of these specific accounts, we believe there are many more in existence and  
25 that new accounts are being created regularly, often under slightly altered names, making  
26 monitoring and enforcement increasingly difficult.  
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1       16. The videos never go away. We have seen videos resurface on the Defendants' platforms  
2 weeks and months after an incident. While a scholar may have believed that an incident was over,  
3 that scholar will again receive tormenting and harassing comments, which lead the scholar to  
4 depression and a need for support.

5       17. Additionally, UMS has observed various challenges promoted by Defendants' platforms,  
6 including but not limited to: (1) Blue Whale Challenge; (2) Blackout Challenge; (3) Cinnamon  
7 Challenge; (4) Bird Box Challenge; (5) Eraser Challenge; and (6) National Smack Somebody's  
8 "Butt" Challenge. As a result of this last challenge, female scholars came to me about the challenge  
9 and having their backsides smacked by other scholars. This led to counseling for them,  
10 investigations pertaining to the incidents, and counseling for the perpetrators of the challenge.  
11

12       18. As far back as 2014, I have had to deal with the ramifications of social media challenges,  
13 such as the Eraser Challenge, which caused burn marks to the hands of many scholars.  
14

15       19. The time that I have to spend on social media-related impacts on students has substantially  
16 increased in the nearly thirty-four years that I have worked in the Irvington School District.

17       20. When I first started as an SAC in 1991, none of my work time with scholars was spent on  
18 social media-related concerns. Since the advent of social media, my time spent has gotten worse  
19 every year. By 2020, that number had risen to around 50%. Now in 2025, I spend up to 70% of my  
20 work time addressing social media's impact on students.  
21

22       21. This means I have less time to dedicate to other aspects of my job. For example, if there  
23 were no social media lure and addiction within UMS, my time could be better spent on more  
24 consistent follow up sessions with other counseling needs of students. I could also spend more of  
25 my time as an HSSC collaborating with community resources that could have positive impacts on  
26 the scholars.  
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1       22. If UMS had additional counselors, it would help address the negative impacts that the rising  
2 use of social media has on scholars and would also allow scholars to more comprehensive mental  
3 health services overall. The Irvington School District has not, however, been able to increase  
4 counselor hiring commensurate with the needs of the student population that has been so negatively  
5 impacted by social media due to funding constraints.  
6

7       23. I regularly interact with the UMS school community, including counselors, administrators,  
8 and other staff. Based on these interactions, it is my understanding that the counselors, deans, and  
9 administrators, including the Principal and Assistant Principals, spend the majority of their days  
10 addressing social media related concerns and that their amount of time spent on social media-related  
11 concerns has increased substantially over the last several years. Based on my experience and  
12 interactions, I believe that, to the best of my current knowledge, Guidance Counselors, Social  
13 Workers/HSSCs, and Climate Specialists at UMS spend up to 85 % of their time today on issues  
14 related to social media. This has increased from approximately 20% in 2014.  
15

16       24. If the demands caused by social media were significantly reduced or did not exist, my time,  
17 in addition to what I stated above, could be allocated to better meeting the overall needs of students,  
18 families and staff at UMS, including, but are not limited to: individual counseling sessions; small  
19 group counseling sessions; classroom lessons; workshops for teachers (building classroom  
20 connections, how to deal with various students) and parents; counseling students who are absent  
21 and tardy to school; collaborating with teachers on the needs of students; maintaining student  
22 records; advocating for students during IEP and 504 meetings; and dedicating more time to the  
23 various committees to which I have been assigned, such as the Comprehensive School Mental  
24 Health Committee, the Behavior Threat Assessment Team, and the School Emergency  
25 Management and Safety Team.  
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1 Pursuant to 28 U.S.C. § 1746, I hereby declare and certify, under penalty of perjury, that the  
2 foregoing is true and correct.

3 Executed on May\_\_\_\_, 2025.

4 Sandra Lopez

5 Sandra Lopez (May 16, 2025) 04101

6 Sandra Lopez